

**From:** [Canright, Phaedra](#)  
**To:** [Smalley, Bryant](#); [Powers, Tim](#)  
**Cc:** [Delhomme, Keith](#); [Brescia, Nicolas](#); [Baxter, Madison](#)  
**Subject:** RE: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16  
**Date:** Tuesday, August 30, 2016 2:53:40 PM  
**Attachments:** [image001.png](#)

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Thanks Bryant – I will make the revisions and get it back to you as soon as possible.

Phaedra

**Phaedra (“Fay”) E. Canright**

*Project Manager*

PPM Consultants, Inc.

Phone: (225) 293-7270

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**From:** Smalley, Bryant [mailto:[smalley.bryant@epa.gov](mailto:smalley.bryant@epa.gov)]

**Sent:** Tuesday, August 30, 2016 2:29 PM

**To:** Canright, Phaedra; Powers, Tim

**Cc:** Delhomme, Keith; Brescia, Nicolas; Baxter, Madison

**Subject:** RE: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16

Phaedra/Tim – I have been reviewing some documents from the Mayflower oil spill and talking with Nicholas Brescia, the FOSC on that spill (also covering the Denham Springs spill for me). He clarified, to make risk based determinations, we would need to use 24 hr samples. If we utilize grab samples, it might show present or not present, but may not be defensible.

Just an excerpt from the mayflower Re-entry plan:

Following air monitoring, analytical air sampling using Summa (vacuum) canisters will be performed inside and outside the residence.

- a. A minimum of one, centrally located indoor air sample will be taken on the lowest level of the residence. An additional sample may be taken on the next highest living or working level of the structure, if one exists, in a centrally located living area or working space.
- b. b. A minimum of one ambient outdoor air sample will be placed adjacent to the residence away from any structure that may impact air flow.
- c. c. Additional indoor air samples may be collected as determined by the sampler.

Analytical air sampling canisters will be located at breathing zone height (approximately 3 ft- 5 ft above the floor).

A minimum of one field duplicate per day or one field duplicate per 20 samples will be collected. A time will be scheduled to pick up the samples following completion of the 24-hr sampling period.

Respectfully,

Bryant Smalley

FOSC

US EPA R6

214-215-1783

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**From:** Smalley, Bryant

**Sent:** Tuesday, August 30, 2016 8:42 AM

**To:** 'Canright, Phaedra' <[phaedra.canright@ppmco.com](mailto:phaedra.canright@ppmco.com)>; Powers, Tim <[Tim.Powers@ppmco.com](mailto:Tim.Powers@ppmco.com)>

**Cc:** Delhomme, Keith <[Keith.Delhomme@WestonSolutions.com](mailto:Keith.Delhomme@WestonSolutions.com)>; Nicolas Brescia

<[Brescia.Nicolas@epa.gov](mailto:Brescia.Nicolas@epa.gov)>; Baxter, Madison ([baxter.madison@epa.gov](mailto:baxter.madison@epa.gov))

<[baxter.madison@epa.gov](mailto:baxter.madison@epa.gov)>

**Subject:** RE: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16

Hi Phaedra – Thank you for the updates. Was a revised copy sent to Daniel or Ed? If not, I will forward it to them.

I only have a couple clarifying questions:

Under 3.1.3 - Surface Soil the first paragraph describes scraping the surface soil, but the next paragraph goes directly into boring to 3 Ft BGS or water is encountered? Are you planning on doing

borings at every location a surface sample is taken? Also, the plan says:  
Soil samples will be collected from each soil boring at continuous 2-foot intervals for laboratory analysis to a maximum depth of 3 feet BGS or first encountered groundwater. This is not clear to me. Does this mean 0-2' will be one sample and 2'-3' will be a second? Other sample plans I have used included splitting the acetate liners and screening with a PID to determine any potentially high areas. Not saying we need to do it that way, just want to clarify our procedure.  
Also, we discussed the air sampling in the Houses yesterday. I think the LDHH will need a longer sample time to be able to weigh in on results. I will follow-up on this today.

Respectfully,  
Bryant Smalley  
FOSC  
US EPA R6  
214-215-1783

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**From:** Canright, Phaedra [mailto:phaedra.canright@ppmco.com]  
**Sent:** Monday, August 29, 2016 11:28 AM  
**To:** Smalley, Bryant ; Powers, Tim  
**Cc:** Delhomme, Keith  
**Subject:** RE: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16  
Bryant,  
Please find below the link to the revised Draft TSAP including LDEQs comments.  
Thanks  
Phaedra



**A file has been sent to you**

from [yousendit@ppmco.com](mailto:yousendit@ppmco.com) via [Hightail](#).

DRAFT Technical Sampling and Analysis Plan

<a href="#">Lard Oil Company, Inc. - Denham Springs Facility - ER Technical Sampling and Analysis Plan - Draft to EPA 8.29.16.pdf</a>	
	<a href="#">Download</a>

Size: **5.92 MB** Content will be available for download until **September 12, 2016 09:26**

**PDT.**

PPM Consultants has sent you project documents for your retrieval. Please click on the link above to download the documents.

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**Phaedra ("Fay") E. Canright**  
*Project Manager*

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**From:** Smalley, Bryant [<mailto:smalley.bryant@epa.gov>]  
**Sent:** Saturday, August 27, 2016 11:57 AM  
**To:** Powers, Tim; Canright, Phaedra  
**Cc:** Delhomme, Keith  
**Subject:** FW: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16  
Phaedra – just got a few more from LDEQ. Hopefully this is it.  
Bryant

-----Original Message-----

From: Bill Schramm  
Sent: Saturday, August 27, 2016 10:54 AM  
To: Ed Ballow; Gary Fulton  
Subject: RE: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16

Ed, I have looked over the draft plan and have the following comments:

1. USTRD can only comment on the soil and groundwater portions of the plan. Vegetation, surface water, building material/waste, or air sampling are not covered by our division.
2. RECAP may be used only for soil and groundwater, other media standards must be determined by the appropriate regulatory division.
3. Sample locations should be checked for utilities by calling 811.
4. If groundwater is to be sampled, a plan for installing the borings/wells should be submitted and include development and plugging and abandonment procedures. The paragraph included is not detailed enough to evaluate.
5. Soil sampling appears to be appropriate. Fractionation is appropriate when THP-D,O exceeds RECAP standards. Be certain the samples are of native soil not sludges or sediment from flooding, RECAP does not apply to those media. Shallow soil borings may be plugged with cuttings if no water bearing zone is encountered, grouting is preferred.

Please contact me if you have additional questions.

-bill-

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From: Ed Ballow  
Sent: Friday, August 26, 2016 4:15 PM  
To: Gary Fulton  
Cc: Bill Schramm  
Subject: Emailing: Lard Oil Denham Springs Facility ER-TSAP-Draft to EPA-8.25.16

Gary,

Can you get the Remediation folks to review and comment on this Sampling plan? Please give me an idea of time required.

Thanks!